

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,

Defendants.

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Case No. 5:21-cv-844-XR
[Consolidated Cases]

**STATE DEFENDANTS’ MOTION TO EXCEED PAGE LIMITS ON THEIR
RESPONSE TO PLAINTIFFS OCA-GREATER HOUSTON, LEAGUE OF WOMEN VOTERS OF
TEXAS, AND REVUP-TEXAS’S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendants Gregory W. Abbott, in his official capacity as Governor of Texas, Jane Nelson, in her official capacity as Secretary of State, John Scott, in his official capacity as Provisional Attorney General of Texas, and the State of Texas (“State Defendants”), respectfully request that the Court grant them permission to exceed the 30-page limit by 30 pages in their response to the motion for partial summary judgment filed herein by Plaintiffs OCA-Greater Houston, League of Women Voters of Texas, and REVUP-Texas (“OCA Plaintiffs”) (ECF 611). In support of this motion, State Defendants show the following:

1. The OCA Plaintiffs on May 23, 2023, filed their motion seeking an extension of the page limit for their Motion for Partial Summary Judgment herein from 30 pages to 90 pages. (ECF 604). On May 25, 2023, the OCA Plaintiffs filed a Supplement to such motion reducing the requested extension from 90 pages to 60 pages.
2. On May 25, 2023, the Court entered its text Order granting the OCA Plaintiffs’ motion as supplemented and granting to OCA Plaintiffs an extension of the page limit for their Motion for Partial Summary Judgment to 60 pages.
3. The OCA Plaintiffs on May 26 filed their Motion for Partial Summary Judgment,

which is 55 pages in length, exclusive of Table of Contents, Table of Authorities, and signatures.

4. To respond fully and fairly to the OCA Plaintiffs' Motion for Partial Summary Judgment, State Defendants need and should be granted a similar extension of the page limits for their Response to 60 pages. Such an extension is for good cause and in the interest of justice.
5. The OCA Plaintiffs are not opposed to this motion or the requested extension of page limits. No party will be prejudiced if the motion is granted.

CONCLUSION

State Defendants respectfully request that the Court grant their Motion to Exceed Page Limits and enter its Order extending the page limits for the State Defendants' Response to the OCA Plaintiffs' Motion for Partial Summary Judgment to 60 pages.

Date: June 23, 2023

Respectfully submitted.

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Provisional Attorney General

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COUNSEL FOR STATE DEFENDANTS

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on June 23, 2023, and that all counsel of record were served by CM/ECF.

/s/ Kathleen T. Hunker
KATHLEEN T. HUNKER